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13 *Attorneys for Defendant Zuffa, LLC, d/b/a*  
Ultimate Fighting Championship and UFC

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16 UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

17 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
18 Vera, Luis Javier Vazquez, and Kyle  
Kingsbury on behalf of themselves and all  
19 others similarly situated,

20 Plaintiffs,

21 v.

22 Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

23 Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF NICHOLAS  
A. WIDNELL IN SUPPORT OF  
DEFENDANT ZUFFA, LLC'S  
OBJECTIONS TO PLAINTIFFS'  
EXHIBIT LIST DOCUMENTS**

1 I, Nicholas A. Widnell, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia. I am admitted *pro*  
3 *hac vice* to practice before this Court. I am a Partner in the law firm Boies Schiller Flexner LLP  
4 and counsel for Zuffa, LLC (“Zuffa”) in the above captioned action in the U.S. District Court for  
5 the District of Nevada, *Le et al. v. Zuffa, LLC*, No. 2:15-cv-01045-RFL-PAL.

6 2. I make this declaration in support of Zuffa, LLC’s Objections to Plaintiffs’ Exhibit List  
7 Documents.

8 3. Based on my review of the files, records, and communications in this case, I have personal  
9 knowledge of the facts set forth in this Declaration, and if called to testify, could and would  
10 testify competently to those facts under oath.

11 4. Since the parties’ exchange of their respective exhibit lists on May 24th, counsel have met  
12 and conferred a number of times to resolve objections to their respective exhibit lists.

13 5. During several meet and confers during the week of June 3rd, Zuffa asked Plaintiffs if  
14 they would agree to a stipulation regarding the use of hearsay in exhibits.

15 6. The proposed stipulation was as follows: “The Parties agree that exhibits identified as  
16 containing hearsay statements may be used during the hearing to the extent an expert has  
17 considered that exhibit in forming an opinion, but not to establish the truth of the matter asserted  
18 by the hearsay statement.”

19 7. Plaintiffs did not agree to Zuffa’s proposed stipulation.

20 8. Exhibit A to this Declaration is the Declaration of Brent K. Nakamura in Support of  
21 Defendant Zuffa, LLC’s Objections to Plaintiffs’ Exhibit List Documents.

22 9. Exhibit B to this Declaration is a list of documents listed on Plaintiffs’ exhibit list to  
23 which Zuffa objects on the basis that they contain hearsay statements that cannot be admitted for  
24 the truth of the matter asserted in those hearsay statements.

1  
2 I declare under penalty of perjury under the laws of the United States of America that the  
3 foregoing facts are true and correct. Executed this 14th day of June, 2019 in Washington, D.C.

4 By: /s/ Nicholas A. Widnell  
5 Nicholas A. Widnell  
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